

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION**

**JERRY MICHAEL PUCKETT,  
ANDREW JOSEPH PUCKETT, and  
G.R.P., a minor child,**

**Plaintiffs,**

**Case No.: 2:23-cv-00123-DCLC-CRW**

**v.**

**UNICOI COUNTY, TENNESSEE,  
CITY OF ERWIN, TENNESSEE,  
MICHAEL HENSLEY,  
JONATHAN “FRANK” ROGERS,  
TONY BUCHANAN, AND  
JOHN AND JANE DOES NO. 1-10**

**Defendants.**

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**MOTION FOR MISCELLANEOUS RELIEF**

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Come now Defendants, Unicoi County, Tennessee, Michael Hensley and Jonathan “Frank” Rogers, by and through undersigned counsel, and respectfully move the Court concerning the Notice of Appearance recently filed by Attorney Alexis Irene Tahinci on December 13, 2023, in light of the Motion to Dismiss/Motion for Definite Statement, which was filed by these Defendants on December 7, 2023, and in advance of the Court's Order governing motions to dismiss and a December 11, 2023.

WHEREFORE, it is respectfully submitted that (1) the Motion to Dismiss by these Defendants be granted, or in the alternative (2) Plaintiffs, now represented by counsel, file an Amended Complaint specifying the alleged acts and omissions of each of the sued Defendants.

RESPECTFULLY SUBMITTED this 10<sup>th</sup> day of December, 2023.

TAYLOR & KNIGHT, GP

s/ Arthur F. Knight, III

Arthur F. Knight, III, BPR# 016178

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### **CERTIFICATE OF SERVICE**

I hereby certify that on December 7<sup>th</sup>, 2023, a copy of the foregoing document was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. The Plaintiffs will be served via regular U.S. Mail at the following address:

Jerry Michael Puckett  
775 Rector Laurel Road  
Flag Pond, TN 37657

Andrew Joseph Puckett  
775 Rector Laurel Road  
Flag Pond, TN 37657

G.R.P.  
775 Rector Laurel Road  
Flag Pond, TN 37657

Parties may access this filing through the Court's electronic filing system.

*s/Arthur F. Knight, III*  
Arthur F. Knight, III